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December 21, 2001

***By Telecopier and Hand Delivery***

Admiral Paul Busick  
Acting Associate Administrator  
for Civil Aviation Security  
ACS-1  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, DC 20591

Re: Request to Extend Comment Period – Docket No. FAA-2001-10999 – 31  
Criminal History Records Checks

Dear Admiral Busick:

On behalf of our respective members, the Air Transport Association of America, Inc. (ATA) and the Regional Airline Association (RAA) respectfully request the FAA to extend the comment period in this matter for 10 days, to January 17, 2002. We make this request for the following reasons:

1. ATA and RAA members have now had a chance to review the final rule and request for comments, published on December 6, 2001. In a recent teleconference among industry participants, it became very clear that implementation of the final rule raises a number of practical and legal issues not readily apparent on the face of the final rule. For example, the rights and responsibilities of airports with respect to CHRC reports and airlines require clarification, as does the authority of an airport or local jurisdiction to exceed the requirements of this rule. The rule also raises a number of legal issues regarding the airline employer-employee relationship and the respective obligations each has under the rule and to each other, whether under state law or a collective bargaining agreement.

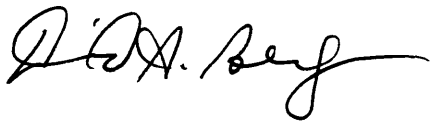
2. ATA and RAA are in the process of drafting comments on the final rule that will explain these and other issues in detail and make recommendations for their resolution. However, that process cannot be completed in time to file comments on January 7<sup>th</sup> due to the intervening holidays. It is important to ATA and RAA that their

members have an opportunity to review and consider the draft comments before they are submitted to the FAA.

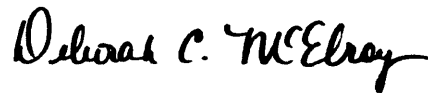
For these reasons, ATA and RAA request that the comment period be extended to January 17, 2002. This short delay will not prejudice the interests of any parties or the public since this rule is in effect already.

Thank you for your prompt consideration of this request.

Very truly yours,



David A. Berg  
Assistant General Counsel, ATA



Deborah C. McElroy  
President, RAA

cc: Docket No. FAA-2001-10999  
Lynne Osmus, ACS-2